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2 STATE BAR NUMBER 5736
2 232 Court Street
Reno, Nevada 89501
3 (775) 786-1615

ELECTRONICALLY FILED
3-29-19

4 Attorney for Debtor

5 UNITED STATES BANKRUPTCY COURT
6 FOR THE DISTRICT OF NEVADA

7 * * *

8 IN RE: Case No. BK-N-18-50418-BTB
9 BETTY M. JOHNSON (Chapter 13)
REPLY TO FIFTEEN DAY NOTICE
OF DEFAULT
10 Hearing Date: N/A
Hearing Time: N/A
11 Time Required: N/A

Debtors.

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12 The Debtor, by and through her attorney, SEAN P. PATTERSON,
13 Esq. filed the following reply to the pending "Notice of Default"
14 filed as Document Number 31 on the docket. This notice is
15 deficient in a number of ways:

- 16
- 17 1. It fails to give the amount needed to cure the default.
 - 18 2. It does not specify what payments have not been made.
 - 19 Miss Johnson is to pay 5 cure payments in the order.
 - 20 3. It does not specify where and how to make the payments
 - 21 to the creditor.

22 Counsel requests that this default be withdrawn. In the
23 alternative, that it be amended to include this relevant
24 information.

25 Respectfully submitted this 29th day of March, 2019.

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/s/ Sean P. Patterson, Esq.
SEAN P. PATTERSON, Esq.

1 CERTIFICATE OF SERVICE

2 Pursuant to the Federal Rules of Civil Procedure, Rule 5(b),

3 I hereby certify that I am an employee of the law firm of **SEAN P.**

4 **PATTERSON**, 232 Court Street, Reno, Nevada 89501; and that on this

5 date, I mailed a true and correct copy of the foregoing document

6 via the United States mail, postage prepaid to:

7 Betty Johnson
8 P.O. Box 6621
9 Reno, Nv. 89513

10 This document was sent via electronic mail to:

11 Christine Roberts, Esq.
12 christine@crobertslaw.net

13 William Van Meter
14 c13ecf@nvbell.net

15 DATED: March 29, 2019.

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 /s/ Sean P. Patterson
 SEAN P. PATTERSON, ESQ.